



State of Utah
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

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November 10, 1993

Mr. Frank Barnett
Environmental Coordinator
Umetco Mining Company
P.O. Box 506
Dove Creek, Colorado 81324

Re: Mine Water Pond Decommissioning, Rim (M/037/006), Velvet (M/037/040), and Hecla (M/037/043), San Juan County, Utah

Dear Mr. Barnett;

This letter is in response to our telephone conversation, on November 9, 1993. We spoke about shutting down the mine dewatering pumps and decommissioning of the ponds at the Velvet, Rim and Hecla mine sites. You asked for regulatory guidance, from this agency, concerning the steps necessary in accomplishing the decommissioning and reclamation of the ponds. The ponds are used to precipitate out solids and low-level radioactive elements. Two ponds are used at each site to effect the process. One pond precipitates out heavy sediments, the other pond uses a barium precipitant to eliminate R226 and R228 from discharge effluents.

The Division (DOGM) has no concern with Umetco shutting down the pumps and discontinuing mine discharge into the ponds. It will be necessary to evaluate the sediments in the ponds prior to disposal, and removal of the water source will facilitate drying out the ponds.

Since the Hecla facility permit contains a 120 day clause between pump shutoff and reclamation, you may want to wait on this site until Spring '94.

You mentioned several alternatives regarding the disposal of the pond sediments: 1. burial in place, 2. removal to the mine, 3. haulage off site to a licensed facility. The Division checked with the Division of Radiation Control (DRC) to determine how the pond sediments should be disposed of. DRC advised that you evaluate the evaporites in the ponds for radium and compare these levels with those found in mine spoils. If the levels are the same or less, the pond sediments could be placed back in the mine. The pond sediments



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must fall into the category of NORM wastes; radium levels must be less than 15 pCi/gram. Another scenario might be to haul them to the Blanding Mill. Apparently, this would be acceptable with the permission of the NRC. This would also require an analysis of the material.

Thank you for your efforts to contact me, regarding this situation. Please contact me directly with further questions.

Sincerely,

A handwritten signature in black ink, appearing to read "H. Shepherd", with a stylized flourish at the end.

Holland Shepherd
Senior Reclamation Specialist

jb

cc: Dane Finerfrock, DRC
Wayne Hedberg, DOGM

M037006